IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

RESONANT SYSTEMS, INC. d/b/a RevelHMI,

Plaintiff,

Case No. 2:22-cv-00423-JRG-RSP

v.

SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC.,

Defendants.

JURY DEMANDED

JOINT CLAIM CONSTRUCTION AND PREHEARING STATEMENT

Pursuant to Local Patent Rule 4-3, and the Court's Docket Control Order (Dkt. No. 63), Plaintiff Resonant Systems, Inc. d/b/a RevelHMI ("RevelHMI") and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, "Defendants" or "Samsung") (all together, the "parties") respectfully submit the following Joint Claim Construction and Prehearing Statement.

I. AGREED CLAIM CONSTRUCTIONS (P.R. 4-3(A)(1))

The parties agree on the following claim constructions with respect to U.S. Patent No. 9,369,081 ("'081 Patent") and U.S. Patent No. 9,941,830 ("'830 Patent") ("the asserted patents").

Claim Term	Agreed Construction
Preamble	The preamble is limiting.
('081 and '830 Patents, claim 1)	

II. **DISPUTED CLAIM CONSTRUCTIONS (P.R. 4-3(A)(2))**

The parties' proposed constructions of disputed terms are forth in the accompanying Exhibit A, along with the intrinsic and extrinsic evidence on which the parties intend to rely.

III. ANTICIPATED LENGTH OF TIME NEEDED FOR THE CLAIM **CONSTRUCTION HEARING (P.R. 4-3(A)(3))**

The parties estimates that three hours will be needed for the claim construction hearing. The parties agree that each side will be allocated half of the total time permitted for the hearing.

IV. PROPOSED WITNESSES TO BE USED AT THE CLAIM CONSTRUCTION HEARING (P.R. 4-3(A)(4))

No party proposes to call witnesses at the claim construction hearing.

V. OTHER ISSUES TO BE ADDRESSED PRIOR TO CLAIM CONSTRUCTION HEARING (P.R. 4-3(A)(5))

The parties are not currently aware of any issues that they would propose taking up at a prehearing conference prior to the claim construction hearing.

Dated: March 26, 2025

/s/ Jin-Suk Park

Jin-Suk Park

jin.park@arnoldporter.com

Christopher Marando

chris.marando@arnoldporter.com

ARNOLD & PORTER KAYE **SCHOLER LLP**

601 Massachusetts Ave., NW Washington, D.C. 20001-3743 Telephone: (202) 942-5000 Facsimile: (202) 942-5555

Melissa R. Smith Texas Bar No. 24001351 melissa@gillamsmithlaw.com **GILLAM & SMITH LLP** 303 South Washington Avenue Marshall, Texas 75670

Respectfully submitted,

/s/ Reza Mirzaie

Reza Mirzaie

California Bar No. 246953

rmirzaie@raklaw.com

Kristopher Davis

California Bar No. 329627

kdavis@raklaw.com

Christian W. Conkle

California Bar No. 306374

cconkle@raklaw.com

Jason Wietholter

California Bar No. 337139

jwietholter@raklaw.com

Paul A. Kroeger

California Bar No. 229074

kroeger@raklaw.com

Qi Tong

California Bar No. 330347

Telephone: (903) 934-8450 Facsimile: (903) 934-9257

Andrew T. ("Tom") Gorham Texas Bar No. 24012715 tom@gillamsmithlaw.com **GILLAM & SMITH LLP**

102 North College Avenue, Suite 800

Tyler, Texas 75702

Telephone: (903) 934-8450 Facsimile: (903) 934-9257

Kevin Cosgrove kevin.cosgrove@arnoldporter.com ARNOLD & PORTER KAYE **SCHOLER LLP**

Three Embarcadero Center, 10th Floor San Francisco, California 94111-4024

Telephone: (415) 471-3100 Facsimile: (202) 471-3400

Daniel S. Shimell Daniel.shimell@arnoldporter.com ARNOLD & PORTER KAYE **SCHOLER LLP**

777 South Figueroa Street, 44th Floor Los Angeles, California 90017-5844

Telephone: (213) 243-4000 Facsimile: (213) 243-4199

Attorneys for Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. ptong@raklaw.com

RUSS AUGUST & KABAT 12424 Wilshire Blvd. 12th Floor

Los Angeles, CA 90025 Phone: (310) 826-7474 Facsimile: (310) 826-6991

Attorneys for Plaintiff

Resonant Systems, Inc. d/b/a RevelHMI

I hereby certify that on March 26, 2025, I served the foregoing document via electronic service on all counsel of record.

> /s/ Reza Mirzaie Reza Mirzaie